<u>REMARKS</u>

Favorable reconsideration of this application is respectfully requested.

Claims 1-46 are pending in this application. Claims 24-46 are added by the present response. Claims 1-23 were rejected under 35 U.S.C. § 102(e) as anticipated by U.S. patent 6,462,754 to <u>Chakraborty et al.</u> (herein "<u>Chakraborty</u>"). Claims 1-3, 8-10, and 15-17 were rejected under 35 U.S.C. § 102(b) as anticipated by U.S. patent 5,751,365 to <u>Yokoyama</u>.

Addressing first the rejection of claims 1-23 under 35 U.S.C. § 102(e) over <u>Chakraborty</u>, that rejection is obviated by the present response.

More particularly, <u>Chakraborty</u> is hereby removed as a valid reference against the pending claims. More particularly, <u>Chakraborty</u> has a filing date of February 22, 1999. The present application is based on two priority documents, JP 11-020387 filed on January 28, 1999, and JP 11-187033 filed on June 30, 1999. Filed herewith are translations of those priority documents. Applicants submit that all the claims currently pending in this application are supported by the earlier Japanese priority document 11-020387 with a priority date of January 28, 1999. Thus, applicants respectfully submit the priority date of June 28, 1999, is herein perfected for the present application, which removes <u>Chakraborty</u> as a valid reference against the pending claims. Thus, the rejections based on <u>Chakraborty</u> are obviated by the present response.

Addressing now the rejection of claims 1-3, 8-10, and 15-17 under 35 U.S.C. § 102(b) as anticipated by <u>Yokoyama</u>, that rejection is traversed by the present response.

It is initially noted that each of the independent claims is amended by the present response to clarify features recited therein. Specifically, independent claim 1 is amended by the present response to more clearly recite a "<u>temporal</u> trajectory of corresponding representative points of corresponding characteristic points of successive frames <u>with a function of time, a coefficient of</u> the function being represented by a parameter". That

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language now clarified in independent claim 1 is fully supported by the original specification for example at page 63, line 10, to page 64, line 4. Independent claims 8 and 15 are also amended by the present response similarly as in independent claim 1.

The above-noted features clarified in the above-noted claims are believed to distinguish over the teachings in Yokoyama.

The outstanding Office Action indicates that Yokoyama determines the position of a representative point in two successive frames in equation 2 at column 6, lines 43-60. However, in response to that position applicants submit that Yokoyama merely teaches a method for performing motion compensation prediction by mapping of a triangular segment as shown in Figure 7 therein. As disclosed in Yokoyama at column 8, lines 6-9, the mapping is performed on corresponding triangular segments between frames, and a corresponding relationship between these segments is represented by an Affine transformation. An Affine transformation merely indicates a relationship of the triangular segment between two frames (previous frame and current frame).

In contrast to the independent claims 1, 8, and 15 as currently written, the Affine transformation of Yokoyama does not approximate a temporal trajectory of corresponding representative points with a function of time.

Moreover, the representative points of Yokoyama are set at intersection points of square grids which partition a frame,[1] and are not representative points of an approximate figure approximating the region or characteristic points of the region.

In such ways, applicants respectfully submit that each of amended independent claims 1, 8 and 15, and the claims dependent therefrom, patentably distinguish over the applied art.
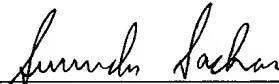
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[1] Yokoyama at column 4, lines 49-54.

The present response also sets forth new claims 24-46 for examination. New claims 24-46 are believed to also distinguish over the applied art.

New claim 24 is similar to independent claim 1 except that new claim 24 recites "approximating a trajectory of corresponding representative points or corresponding characteristics of at *least three successive frames* with a function, the function being represented by a parameter". New independent claims 31 and 38 also recite similar features. Applicants respectfully submit that <u>Yokoyama</u> also fails to teach or suggest such a feature. Thus, new claims 24-46 also distinguish over the applied art.

As no other issues are pending in this application, it is respectfully submitted that the present application is now in condition for allowance, and it is hereby respectfully requested that this case be passed to issue.

Respectfully submitted,

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